# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Ronald Keith Farrington Case No. 21-51146-KMS
Traci Victoria Farrington, Debtors CHAPTER 13

#### **NOTICE**

The above referenced debtors have filed papers with the court to allow payment arrearage.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk U.S. Bankruptcy Court Dan M. Russell, Jr. United States Courthouse 2012 15th St., Ste. 244 Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: May 28, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer Ann Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O Box 13767 Jackson, MS 39236

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Ronald Keith Farrington Case No. 21-51146-KMS
Traci Victoria Farrington, Debtors CHAPTER 13

#### MOTION TO ALLOW PAYMENT ARREARAGE

COME NOW, Debtors, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

- 1. Debtors filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
- 2. Debtors fell behind on the plan payments.
- 3. Debtors are requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
- 4. Debtors are requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in July 2025.

WHEREFORE, Debtors pray for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
Jennifer Ann Curry Calvillo (MS Bar No. 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

## **CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Allow Payment Arrearage was forwarded on May 28, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

11	21-31140-NWS DKt 31 Filed 05/29/25 Efftered 05/29/25 08.30.18 Page 4 018
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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI
5	SOUTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 21-51146-KMS
7	RONALD KEITH FARRINGTON TRACI VICTORIA FARRINGTON  CERTIFICATE OF SERVICE
8	Chapter: 13
9	
10	
11	On 5/28/2025, I did cause a copy of the following documents, described below,
12	Notice and Motion to Allow Payment Arrearage
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18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
21	com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system.  DATED: 5/28/2025
24	/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr.
25	Attorney at Law The Rollins Law Firm
26	702 W. Pine Street Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
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21-51146-KMS Dkt 31 Filed 05/29/25 Entered 05/29/25 08:30:18 Page 5 of 8 2 3 UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI 5 IN RE: CASE NO: 21-51146-KMS 6 RONALD KEITH FARRINGTON **CERTIFICATE OF SERVICE** TRACI VICTORIA FARRINGTON **DECLARATION OF MAILING** Chapter: 13 8 9 10 On 5/28/2025, a copy of the following documents, described below, Notice and Motion to Allow Payment Arrearage 12 13 14 15 16 18 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient 19 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth 20 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above 21 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief. 22 DATED: 5/28/2025 23 24 25 Miles Wood BK Attorney Services, LLC 26 d/b/a certificateofservice.com, for Thomas C. Rollins, Jr. The Rollins Law Firm 702 W. Pine Street 28 Hattiesburg, MS 39401

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USPS FIRST CLASS MAILING RECIPIENTS: Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 21-51146-KMS SOUTHERN DISTRICT OF MISSISSIPPI WED MAY 28 12-25-25 PST 2025

(P) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999

SPEEDYRAPID CASH 15 BULL STREET SUITE 200 SAVANNAH GA 31401-2686

VANDERBILT MORTGAGE AND FINANCE INC PO BOX 9800 MARYVILLE TN 37802-9800

US BANKRUPTCY COURT DAN M RUSSELL JR US COURTHOUSE 2012 15TH STREET SUITE 244

1ST HERITAGE 11516 LAMEY BRIDGE RD STE B2 DIBERVILLE MS 39540-2275

AD ASTRA RECOVERTY 3607 N RIDGE RD WICHITA KS 67205-1230 CREDIT ACCEPTANCE CORPORATION 25505 W 12 MILE RD SUITE 3000 SOUTHFIELD MI 48034-8331

CAPITAL COMMUNITY BANK 3280 N UNIVERSITY AVE PROVO UT 84604-4405

CAPITAL ONE BANK USA PO BOX 30285 SALT LAKE CIT UT 84130-0285 CREDIT ACCEPTANCE PO BOX 5070 SOUTHFIELD MI 48086-5070 CREDIT COLLECTION SERC 725 CANTON ST NORWOOD MA 02062-2679

CREDIT ONE BANK PO BOX 98873 LAS VEGAS NV 89193-8873

EMBCC PATIENT SERVICES PO BOX 731584 DALLAS TX 75373-1584

T<sub>1</sub>T<sub>1</sub>C DBA 1ST HERITAGE CREDIT FIRST HERITAGE CREDIT 12373 HWY 49 STE 2 GULFPORT MS 39503-2980

FIRST HERITAGE CREDIT OF MISSISSIPPI

PO BOX 105555 ATLANTA GA 30348-5555 HANCOCK EMERGENCY GROU PO BOX 731584 DALLAS TX 75373-1584

HMC GROUP 29065 CLEMENTS RD WESTLAKE OH 44145-1179

D) (P) JEFFERSON CAPITAL SYSTEMS LIC

KRISTINA LISCOMB 13160 TEAUNGE RD SAUCIER MS 39574-8338

RESURGENT CAPITAL SERVICES PO BOX 10587

LVNV FUNDING LLC

GREENVILLE SC 29603-0587

MDG USA INC 3422 OLD CAPITOL TRAIL PMB 1993 WILMINGTON DE 19808-6124

MARINER FINANCE LLC 8211 TOWN CENTER DR NOTTINGHAM MD 21236-5904

MEMORIAL EMERGENCY PHY PO BOX 2080 KILMARNOCK VA 22482-2080

MEMORIAL HOSPITAL PO BOX 1810 GULFPORT MS 39502-1810

MIDLAND CREDIT MANAGEMENT INC PO BOX 2037 WARREN MI 48090-2037

MIDLAND FUND 320 EAST BIG BEAVER TROY MI 48083-1238

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(P)MOBILOANS LLC 151 MELACON RD MARKSVILLE LA 71351-3065 NAVY FEDERAL CREDIT UNION PO BOX 3000 MERRIFIELD VA 22119-3000 OPPORTUNITY FINANCIAL LLC 130 E RANDOLPH STREET SUITE 3400 CHICAGO IL 60601-6379

OPPURTUNITY FINANCIAL 130 E RANDOLPH ST CHICAGO IL 60601-6207 PETAL CARD 2WEBBANK PO BOX 105168 ATLANTA GA 30348-5168 PORTFOLIO RECOVERY ASS 120 CORPORATE BLVD STE 100 NORFOLK VA 23502-4952

(P) PORTFOLIO RECOVERY ASSOCIATES LLC PROGRESSIVE PO BOX 41067 11629 SO 700 NORFOLK VA 23541-1067 DRAPER UT 8

PROGRESSIVE 11629 SO 700 E DRAPER UT 84020-8376 QUEST DIAGNOSTICS PO BOX 740781 CINCINNATI OH 45274-0781

RNR TIRE EXPRESS 12407 US 49 GULFPORT MS 39503-4090 (P)REPUBLIC FINANCE LLC 282 TOWER RD PONCHATOULA LA 70454-8318 RESURGENT CAPITAL SERV 15 SOUTH MAIN ST STE 600 GREENVILLE SC 29601-2768

SOUTH MS COLLECTION SE PO BOX 1511 PASCAGOULA MS 39568-1511 SOUTHERN FINANCIAL SVC PO BOX 15203 HATTIESBURG MS 39404-5203 SPEEDE CASH PO BOX 780408 WICHITA KS 67278-0408

EXCLUDE

(B) SPEEDYRAPID CASH 15 BULL STREET SUITE 200 SAVANNAH GA 31401-2686 THE PEOPLES BANK PO DRAWER 529 BILOXI MS 39533-0529 EXCLUDE

UNITED STATES TRUSTEE 501 EAST COURT STREET SUITE 6-430 JACKSON MS 39201 5022

EXCLUDE

VANDERBILT MORTGAGE PO BOX 9800 MARYVILLE TN 37802-9800 (D) VANDERBILT MORTGAGE AND FINANCE INC VERIZON PO BOX 1 MARYVILLE TN 37802 9800 SAINT PE

PO BOX 11328 SAINT PETERSB FL 33733-1328

VERIZON
BY AMERICAN INFOSOURCE AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

WEBBANK 215 S STATE ST STE 1000 SALT LAKE CIT UT 84111-2336 WORLD ACCEPTANCE CORP PO BOX 6429 GREENVILLE SC 29606-6429

WORLD FINANCE
WORLD ACCEPTANCE CORPORATION
ATTN BANKRUPTCY
PO BOX 6429
GREENVILLE SC 29606-6429

JENNIFER A CURRY CALVILLO THE ROLLINS LAW FIRM 702 W PINE ST HATTIESBURG MS 39401-3836 DEBTOR RONALD KEITH

RONALD KEITH FARRINGTON 7062 BONANZA DR LONG BEACH MS 39560-9009 21-51146-KMS Dkt 31 Filed 05/29/25 Entered 05/29/25 08:30:18 Page 8 of 8

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EXCLUDE

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767

TRACI VICTORIA FARRINGTON 7062 BONANZA DR LONG BEACH MS 39560-9009 EXCLUDE

(P)WARREN A CUNTZ T1 JR PO BOX 3749 CULFPORT MS 39505 3749